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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF ENFORCEMENT

DATE: November 14, 1979

SUBJECT: PSD Performance Testing for IC Engines

FROM: Director  
Division of Stationary Source Enforcement

TO: Diana Dutton, Director  
Enforcement Division, Region VI

The attached letter from the United Gas Pipe Line (UGPL) Company concerns the performance testing requirements for two internal combustion engines (ICE's) that are under review for PSD. The company asks whether performance testing may be conducted by the manufacturer at the manufacturing plant laboratory, rather than by the owner at the actual operating site.

The proposed NSPS for IC engines (July 23, 1979) provides that initial performance tests may be conducted by manufacturers as long as Reference Method 20 is followed precisely and as long as the engine operating parameters in effect during the performance test are not varied during operation by the owner.

In light of these NSPS provisions, I believe that manufacturer performance testing should be an option under PSD. Of course, the case-by-case nature of PSD review suggests that in cases where EPA feels it would be inappropriate for a particular engine to be tested in this manner, the testing requirements may be specified accordingly.

Because the UGPL request was made with respect to particular permit applications under review by your office, rather than to general Agency policy I feel it would be more appropriate for you to respond.

I should remind you that the NSPS regulation is not yet finalized and should the NSPS testing policy change, the PSD policy, might be subject to change as well. For now, though, I recommend proceeding in accordance with the proposed NSPS regulation.

If you have any questions regarding this discussion, please contact Libby Scopino (755-2564) of my staff.

Edward E. Reich

cc: John Hepola, R-VI  
Doug Bell, OAQPS  
Bruce Diamond, OGC  
Jim Weigold, OAQPS

UNITED GAS PIPE LINE COMPANY  
700 MILAM PO BOX 1478  
HOUSTON TEXAS 77001  
TELEPHONE (713)237-4123

October 5, 1979

Mr. Marvin Durning  
Assistant Administrator for Enforcement  
Environmental Protection Agency  
401 M Street, S.W.  
Washington, D.C. 20460

Dear Mr. Durning:

The purpose of this letter is to request that performance tests for PSD permits LA-230 and TX-211 be conducted at the manufacturer's laboratory facilities. Background information on these applications is included for your use.

Presently, United has pending two applications, in the draft permit stage, for Protection of Significant Deterioration (PSD) under the Clean Air Act. Region VI is processing the permits and United anticipates issuance by late October, 1979.

The sources of emissions covered by both applications are stationary internal combustion engines used for natural gas compression and subsequent transmission. Oxides of nitrogen are the only emissions of significant quantity as all other pollutants are negligible.

As a necessary condition of the forthcoming permits, a performance test is required. In cooperation with the engine manufacturers, United has undertaken a program to test our engines at the manufacturing plant laboratory. Hopefully, tests will aid us in developing technology which will reduce emissions. Necessarily, the test methods, procedures, and instruments used for measuring emissions will be scientifically precise. They would, of course, meet EPA specifications.

Proposed then is performance testing at the manufacturer's facility to eliminate duplicative efforts and costs. United believes that a program, such as the one set forth by EPA in the New Source Performance Standard for Internal Combustion Engines, to permit manufacturer certification and testing emission rates is cost effective and reasonable.

Confirmation of the NSPS-ICE program has been obtained from Mr. Doug Bell, of EPA (919-541-5477) who is the author of the regulation. In that EPA has determined that this type of procedure can be implemented upon effective date of the regulation, United requests permission to adopt this option to our current practices, whenever feasible and convenient.

UNITED GAS PIPE LINE COMPANY

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Field validation of laboratory results will be accomplished by application of manufacturer supplied nomographs of engine parameters. Operation of the engines would be limited by the nomographs in order that permit conditions are satisfied.

Your prompt attention and cooperation in working with United in this matter is appreciated.

Sincerely,

William N. Young, III  
Coordinator of Environmental Affairs

WNY:ef

cc: Ms. Diana Dutton, EPA, Region VI  
Mr. Doug Bell, EPA, R.T.P., N.C.

Mr. R. J. Simmons, Jr.  
Mr. C. R. Vandewater  
Mr. L. W. Riall  
Mr. N. J. Schaefer  
Mr. T. G. Walker